



DIVISION OF WATER RESOURCES  
401 CHURCH STREET  
6<sup>TH</sup> FLOOR L&C ANNEX  
NASHVILLE, TN 37243

November 30, 2012

Ms. Carol Chandler  
Natural Resources Conservation Service  
675 U.S. Courthouse  
801 Broadway  
Nashville, TN 37203

RE: TDEC Concurrence on Conditions Where Risk of Phosphorus Loss is Low

Dear Ms. Chandler,

Thank you for your letter regarding the revisions that the Natural Resources Conservation Service in Tennessee (TN NRCS) is making to the 590 Nutrient Management Conservation Practice Standard (CPS) for Tennessee, which includes updating the Phosphorus Index.

Your letter stated that a task force is assigned to update the Phosphorus index. The task force includes representatives from the University of Tennessee (UT), the Tennessee Department of Agriculture (TDA), TDEC, and NRCS State and Area Staff, and they recommended the following conditions be set to determine when the risk of phosphorus loss is low:

1. Low or medium soil test phosphorus (STP) levels based on current soil test(s);
2. Slope is less than or equal to 5%;
3. Soil loss is less than or equal to the soil loss tolerance (T); and,
4. Nutrient application(s) shall not exceed UT recommendations.

We concur with the task force's recommendation that meeting all four of these conditions on a per field basis is acceptable for confirming a low risk of phosphorus loss to local waters.

Thank you for your commitment to environmental excellence.

Sincerely,

Alan Schwendimann  
Chief Deputy Director

cc: Ms. Pat Turman, State Agronomist, NRCS, pat.turman@tn.usda.gov